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February 23, 2001

BY TELECOPY

Cathleen R. Martwick, Esq.
U.S. Environmental Protection Agency
Region 5
Office of the Regional Counsel
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: **GMO Site, Northwest Corner of McClurg Court and East Grand Avenue, Chicago, Illinois**

Dear Ms. Martwick:

Our client Teachers' Retirement of the State of Illinois ("TRS") has previously acquired the GMO Site (at the location described above) by deeds in lieu of foreclosure and has submitted requests to the U.S. Environmental Protection Agency ("USEPA") for (i) a determination by USEPA that TRS is a secured creditor for purposes of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S. §9601 *et seq.* ("CERCLA"), and (ii) a prospective purchaser agreement with respect to Golub Real Estate Corp. ("Golub"), the purchaser of the GMO Site, or any other party who purchases the GMO Site from TRS. In addition, TRS understands that USEPA intends to issue either (a) an amendment to its existing administrative order with respect to the Lindsay Light Superfund Site under CERCLA §106 requiring Kerr-McGee Chemical, L.L.C., the corporate successor of Lindsay Light Company ("Kerr-McGee"), to proceed with removal action at the GMO Site or (b) an Action Memorandum setting forth USEPA's determination that the administrative order previously issued by USEPA with respect to the Lindsay Light Superfund Site requires Kerr-McGee to perform such removal action on the GMO Site. To date, USEPA has not acted on any of the foregoing matters which are essential in order to clarify USEPA's regulatory requirements and determinations relating to the GMO Site.

Golub has previously advised TRS (and TRS has advised USEPA) that it needed the removal action at the GMO Site to be commenced on or before March 1, 2001. We are now almost at that date without USEPA having clarified any of the regulatory requirements and determinations

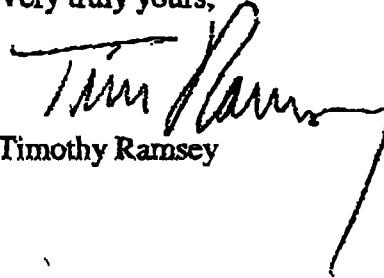


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described above. We request that USEPA accelerate its process to issue these clarifications and determinations quickly so that the removal action will be able to proceed in a manner consistent with USEPA's requirements and determinations.

Very truly yours,



Timothy Ramsey

JTR:mmz

cc: Mary L. Fulghum, Esq.
Mr. Terry A. McKay
Mr. Thomas J. Pabian
Steven L. Loren, Esq.
James T. Mayer, Esq.
Christina King Loundy, Esq.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD 0000002212

This Site is not on the National Priorities List (NPL).

Beginning in about 1904 and continuing through the early 1930s, the Lindsay Light and Chemical Company manufactured gaslight mantles impregnated with thorium in the City of Chicago. The Lindsay Light operations originated at 22 W. Hubbard and later moved to 161 E. Grand and at 316 E. Illinois in Chicago, Illinois. The 316 E. Illinois address was the location where thorium was extracted from radioactive ores. The Hubbard and Grand sites are believed to be where thorium was used to manufacture mantles. These Lindsay Light refining and manufacturing processes created radioactive wastes that were disposed of in undetermined locations. Pursuant to an Administrative Order by Consent (AOC) authorized by Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) dated January 27, 1994, the Lindsay Light II property owner, Chicago Dock & Canal Trust ("Chicago Dock") characterized the thorium contamination present within the Lindsay Light II site at 316 East Illinois. On June 6, 1996, U.S. EPA issued a Unilateral Administrative Order, Docket No. V-W-96-C-353, (the "UAO"). The UAO required the Respondents, Kerr McGee Corporation and Chicago Dock, to remove thorium contaminated materials from the Lindsay Light II site and to conduct off-site surveying and sampling as necessary and, at a minimum implement the standards of 40 CFR 192 if deemed necessary should contamination be discovered beyond current site boundaries. In early February 2000, contractors for the City of Chicago conducting a sewer line replacement project along Illinois Street adjacent to the Lindsay Light II site discovered off-site thorium contamination. Later that month, U.S. EPA discovered thorium contamination at the Grand Pier L.L.C. development across the street and directly west of the Lindsay Light II site. On March 29, 2000, U.S. EPA issued the First Amendment to the UAO that amended the Lindsay Light II Site definition to include property directly west of and across the street from the Site, and which was designated as RV3/North Columbus Drive.

Please refer to the previous Action Memoranda dated July 11, 1994, October 5, 1995, April 22, 1996, September 22, 1999, and March 28, 2000 for a description of site conditions and background.

From 1947 to 1988, the GMO property that is the subject of this Amendment was the headquarters and research center for Velsicol Corporation and later Sandoz Limited. In 1988, the buildings were razed and the land was used for a parking lot. U.S. EPA has no information that Chicago Dock formerly owned the GMO property.

On May 31, 2000, TRS informed U.S. EPA that elevated levels of radioactive materials had been detected at the GMO property. This information was supported by the U.S. EPA Scanner Van radiation survey of the GMO property and by a gamma survey meter walkover by U.S. EPA staff. Following this disclosure, the property owner, Kerr-McGee L.L.C. and U.S. EPA met several times to discuss the extent of the contamination on the GMO property and make